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BEFORE THE

**Federal Communications Commission**

NOV - 5 2002

WASHINGTON, D. C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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In the Matter of

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Amendment of Section 73.202(b)

MM Docket No. \_\_\_\_\_

Table of Allotments,

RM-\_\_\_\_\_

FM Broadcast Stations

(Saluda and Irmo, South Carolina)

To: Chief, Allocations Branch, Mass Media Bureau

**SUPPLEMENT TO PETITION FOR RULEMAKING**

Breckenridge Communications, LLC ("BC"), licensee of Station WJES-FM, Channel 221A, Saluda, South Carolina, herein supplements the Petition for Rulemaking it filed March 1, 2002

In its Petition for Rulemaking, BC asks the Commission to (a) re-allot Channel 221A from Saluda, South Carolina, to Irmo, South Carolina, (b) substitute Channel 221C3 for Channel 221A at Irmo and (c) modify the WJES-FM license to specify operation on Channel 221C3 at Irmo. Through this supplement, BC submits a preclusion study verifying that adoption of its proposal to upgrade WJES-FM to Class C3 status will not, in and of itself, preclude the establishment of new or upgraded noncommercial educational stations on Channels 218,219 and 220.

Background. It has come to BC's attention that the 1.0 mv/m contour of WJES-FM operating on Channel 221C3 at the proposed Irmo reference point would overlap the grade B contour of Station WJBF(TV), Channel 6, Augusta, Georgia. The Commission has indicated in situations where an upgrade on Channel 221 would result in the upgraded station's 1.0 mv/m contour overlapping the grade B contour of a Channel 6 station, the proponent of the FM station's upgrade

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should provide a preclusion study demonstrating the impact of the upgrade proposal on the availability of noncommercial educational allotments on Channels 218, 219 and 220. **See First Report and Order in MM Docket No. 86-144**, 2 FCC Rcd 660 (1987) (adopting Note to 47 C.F.R. § 1.420(h)).

Accordingly, BC has commissioned Douglas Vernier Telecommunications Consultants to prepare a Preclusion Study. That study is included as Attachment A hereto. The study comports with the Commission's guidelines set forth in **Fayetteville, Arkansas**, 5 FCC Rcd 2539 (Chief, Allocations Branch, 1990).

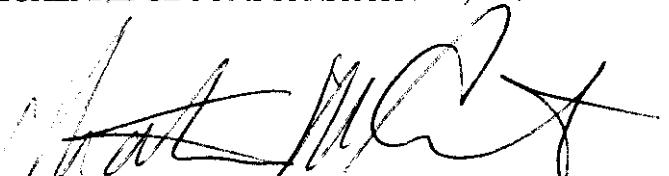
**Study Results.** As detailed in the attached Preclusion Study, upgrading WJES-FM on Channel 221C3 at Irmo, South Carolina, will not preclude the establishment of any new or upgraded noncommercial educational station on Channel 218, 219 or 220. In essence, new and upgraded stations on those channels are already precluded by existing facilities. The one small area which is not already precluded by existing facilities is precluded by the pendency of three previously filed noncommercial educational applications. **See** Attachment A at p. 2.

In light of the fact that BC's proposal will not preclude the establishment or improvement of noncommercial educational service on Channels 218, 219 and 220, it is respectfully requested that a Notice of Proposed Rule Making regarding BC's proposal be issued.

Reddy, Begley & McCormick, LLP  
2175 K Street, N.W., Suite 350  
Washington, D.C. 20037-1875

November 5.2002

BRECKENRIDGE COMMUNICATIONS, LLC



By: \_\_\_\_\_

MATTHEW H. McCORMICK  
Its Counsel

**BRECKENRIDGE COMMUNICATIONS, LLC**

**PRECLUSION STUDY**

**CHANNEL 221C3  
IRMO, SOUTH CAROLINA**

October 31, 2002

Prepared by:

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**Engineering Statement**  
On Behalf of Breckenridge Communications, LLC  
October 31, 2002

We have been asked by Breckenridge Communications, LLC to prepare a study showing the preclusive impact on channels 218, 219 and 220 of its requested upgrade of channel 221A, Saluda to 221C3, Irmo. We have performed said study and have determined that there is no preclusive impact on any afore mentioned channels due to preclusions caused by existing stations.

**Study Method:**

In a Notice of Proposed Rule Making in MM Docket No. 90-201, released April 17, 1990 the Commission Staff outlined the procedure for determining the preclusive impact of a proposed upgrade on channel 221. The NPRM stated that, "For each class of noncommercial educational FM station, maximum power and antenna height and omni-directional power should be assumed."

Except with regard to relationships with channel 221, 222 and 223, NCE stations are assigned on the basis of the prevention of contour overlap.<sup>1</sup> It is known that the Commission's commercial spacings tables as defined in Section 73.207 (b) (1) are essentially based on the minimum spacings between stations that avoids contour overlap at full class facilities. The studies herein use these minimum spacing distances to show that there are no locations where new stations on channels 218-220 can be located, at any class, due to the preclusive effects of existing stations.

The maps in attachment #1 show the minimum spacing distances with respect to existing stations, on each of channels 218, 219 and 220, that must be maintained for the introduction of a new class A station operating at the maximum antenna height and power for the class<sup>2</sup>. In other words, no new station is allowed to have a transmitter site within any of the minimum separation circles found on the map. Such areas would be "precluded" from use because of existing operating

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<sup>1</sup> Sec 73.215 now allows NCE stations on channels 218, 219 and 220 to use contour protection to commercial stations assigned to the first three commercial channels. In such cases, the protection must be afforded the commercial channel stations as if they were operating with the maximum facilities for their class

<sup>2</sup> On each map, the licensed facility (or construction permit if one existed) of each station was used. Application records were omitted.

stations. To make the “preclusion” areas more visible we have used a transparent fill color to shade each minimum separation circle. Consequently, any area shown on the map that is not shaded is available for use on the studied channel or is beyond the maximum distance for consideration.

### Consideration distance:

Since the maps in our analysis show the areas where class A stations are precluded from operation, the question arises as to how we can tell that classes other than class A are precluded in a given area. If one were to look at the separation tables detailed under Section 73.207 (b) (1) he or she would find that the minimum distance separations for class B1 or C3 are greater than for class A. It is a fact that as the classes increase so do the minimum spacings distances, without exception. So, a preclusion area defined for class A stations will also be valid up to the highest class C stations as long as you look far enough out. Each of the three maps presented has an unfilled circle displayed on it that represents the minimum distances the proposed class C3 station must be located from the highest class C station.<sup>3</sup> Since the applicant proposes a class C3 station, if all of the minimum spacing class A circles are filled within the plotted C3 to C distance circle, one can deduce that no classes greater than the class A station (such as the class C station) would be allowed as well. In other words, if there can be no new class A stations within the C3-C minimum spacings distances for each channel 218, 219 and 220, there can obviously be no higher class stations either. The class C3-C minimum spacing distances used for the circles are as follows:

Channel	C3-C minimum distance separation (kilometers)
218	96
219	176
220	147

It should be noted that the preclusion circle for the applicant’s proposed C3 facility serving Irmo, does not appear on any of the maps. Therefore, any available area for class A stations is shown before the impact of the additional preclusion the Irmo, C3 facility would cause. With the exception of channel 220, the channel maps show that no new stations are possible. There is one place on the channel 220 map (near Toomsboro, GA, as defined by the arrow) where a class A NCE station would be possible, and we find that there are already three applications on file for stations that would be built at or near this location.<sup>4</sup> Therefore, there are no areas, whatsoever, available for a new class A station or

<sup>3</sup> The center of the circle is at the proposed Irmo allocation site. The map identifies the center of the circle and the proposed facility’s call letters have been labeled ‘RADD.’

<sup>4</sup> The names and locations of cities having a population of 1000 or more are plotted on the maps.

greater on any of the channels 218 through 220. Consequently, the proposal for channel 221C3, Irmo, will not cause any new preclusions because all relevant locations are already precluded for use by existing stations.

### **Preclusions caused to existing NCE stations on channels 218 through 220.**

We found eleven existing stations/applications within the consideration distances. These are as follows (See attachment #2, pages 1-20):

**WARA channel 218A, Laurens, SC.** The current WJESFM, Saluda class A facility imposes a greater restriction on WARA than the proposed C3, Irmo facility. The channel printout labeled as Attachment #2 shows that WARA is not precluded by the proposed facility from increasing its class from A to C3. Preclusions from other stations may exist.

**WKCL channel 218C1, Ladson, SC.** This station operates using 100 kW from an antenna height of 100 meters HAAT. It can upgrade to a full class C without any preclusion from the Irmo, C3, proposal. Other relationships however, would prevent this class increase.

**WLPE, channel 219A, Augusta, GA.** This station may not upgrade its class to a C3 due to its relationship with WARG, Evans, SC. It does not meet the minimum distance to apply Section 73.215 (shortspacing) with regard to this WARG.

**WLPG, channel 219, Florence, SC.** This station can upgrade to a full class C without any impact from the proposed Irmo, C3, upgrade.

**WRCM, channel 220C3, Wingate, SC.** This station operates at 10 kW from an antenna height of 157 meters HAAT. WRCM is limited to its existing omnidirectional power by WSGE.C, Dallas, NC. A Directional antenna could be employed allowing WRCM to operate using Sec 73.215 (shortspace) at a maximum of 100 kilowatts toward the proposed Irmo, C3, facility. (A contour-to-contour allocation map is attached.)

**WSGE (CP), channel 219C2, Dallas, NC.** This station can upgrade to a class C with no impact from the C3 Proposal at Irmo.(other stations preclude this upgrade.)

**WUNC, channel 220C, Chapel Hill, NC.** The C3, Irmo proposal has no impact on this station.

**AP220, Channel 220, Toomsboro, GA.** Application at Toomsboro receives no preclusive impact from Irmo, C3, Proposal.

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**991504, Channel 220, Milledgeville, GA.** Application at Milledgeville, GA receives no preclusive impact from Irrno, C3 ,Proposal.

**AP220, Channel 220, Milledgeville, GA.** Application at Milledgeville, GA receives no preclusive impact from Irrno, C3 ,Proposal.

**WUGA, Channel 219 A, Athens, GA.** This station receives no preclusive impact caused by the Irrno, C3 proposal.

Since we have demonstrated that the proposed C3 ,Irrno, facility has no preclusive impact on NCE stations on channels 218-220, the issue relating to channel-six TV protection and the impact the proposed C3 ,Irmo facilities would have on NCE stations is deemed moot.

Doug Vernier

**Declaration:**

I, Douglas L. Vernier, declare that I have received training as an engineer from the University of Michigan School of Engineering. That, I have received degrees from the University in the field of Broadcast Telecommunications. That, I have been active in broadcast consulting for over 25 years;

That, I have held a Federal Communications Commission First Class Radiotelephone License continually since 1964. In 1985, this license was reissued by the Commission as a lifetime General Radiotelephone license no. PG-16-16464;

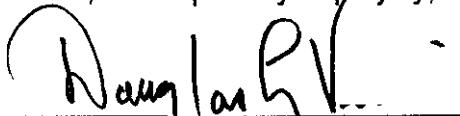
That, I am certified as a Professional Broadcast Engineer (#50258) by the Society of Broadcast Engineers, Indianapolis, Indiana. (Recertified 10/2000.)

That, my qualifications are a matter of record with the Federal Communications Commission;

That, I have been retained by Breckenridge Communications, LLC to prepare the engineering showings appended hereto:

That, I have prepared these broadcast engineering showings, the technical information contained in same and the facts stated within are true of my knowledge;

That, under penalty of perjury, I declare that the foregoing is correct.

 Douglas L. Vernier

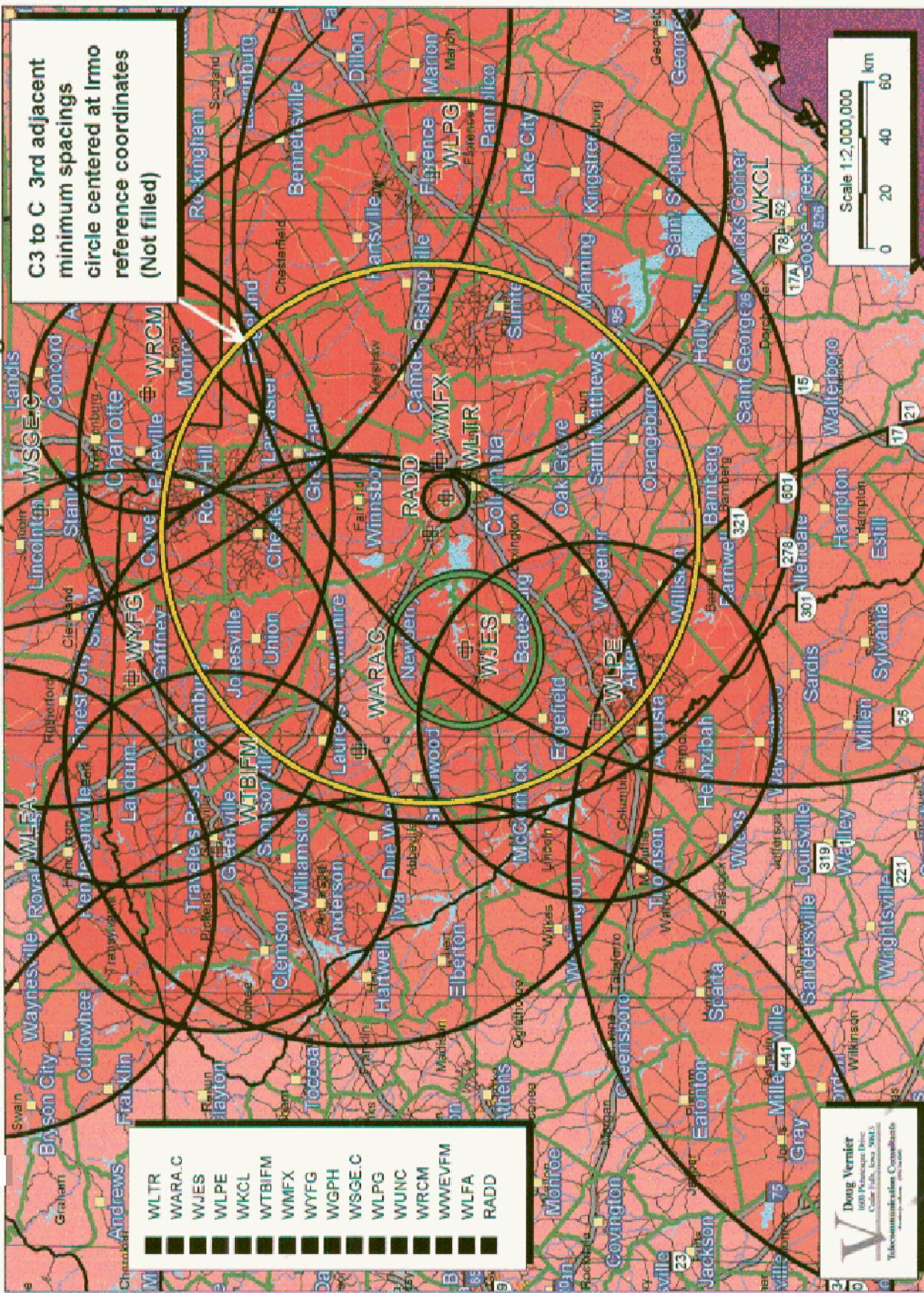


Executed on October 31, 2002

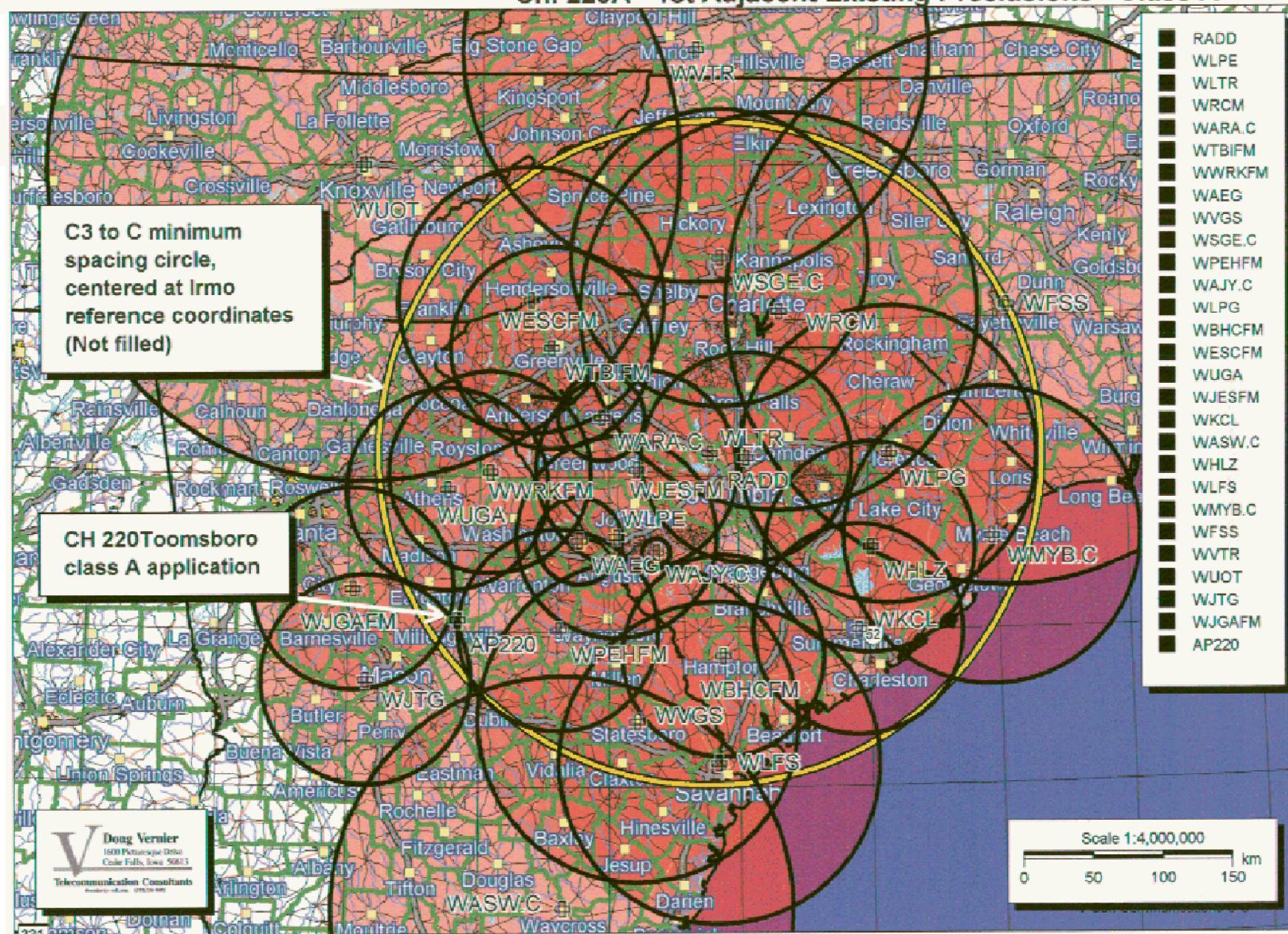
Subscribed and sworn before me this October 31<sup>st</sup>. 2002



Katherine J. Michler  
Notary Public in and for the State of Iowa

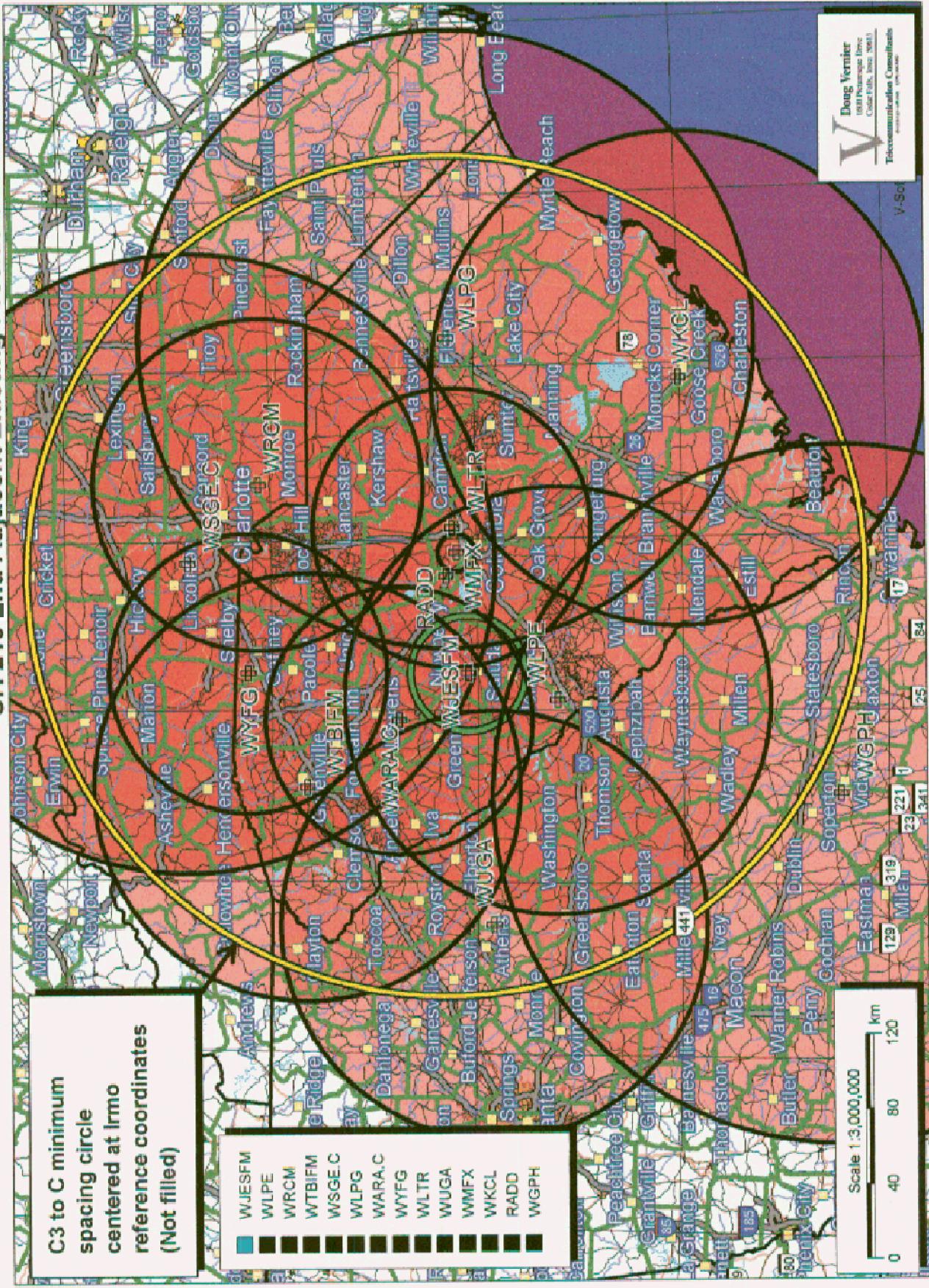
**CH 218 - 3rd Adjacent Existing Precussions - Class A**

## Ch. 220A - 1st Adjacent Existing Preclusions - Class A



CH 219 2nd Adjacent Existing Preclosures - Class A

C3 to C minimum  
spacing circle  
centered at Irmo  
reference coordinates  
(Not filled)



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Doug Vernier Telecommunication Consultants  
 1600 Picturesque Dr. Cedar Falls, IA 50613  
 Breckenridge Communications, LLC  
 WARA - Upgraded to next highest class

REFERENCE				DISPLAY DATES			
34	23	01	N	CLASS = C3	DATA	10-18-02	
82	03	23	W	Current Spacings	SEARCH	10-18-02	
<hr/> ----- Channel 218 - 91 5 MHz -----							
Call	Channel	Location		Dist	Azi	FCC	Margin
WARA.C	CP -D 218A	Laurens		SC 0.00	0.0	142.0	-142.00
WLTR	LIC 217C1	Columbia		SC 107.25	105.7	144.0	-36.75
WTBIFM	LIC 219A	Greenville		SC 61.28	324.3	89.0	-27.72
WLPE	LIC 219A	Augusta		GA 86.28	172.9	89.0	-2.72
WLPE.A	APP 219A	Augusta		GA 90.81	172.2	89.0	1.81
WLPE.A	APP-N 219A	Augusta		GA 90.81	172.2	89.0	1.81
WJESFM	LIC 221A	Saluda		SC 45.04	146.1	42.0	3.04
RDEL	DEL 221A	Saluda		SC 45.04	146.1	42.0	3.04
WYFG	LIC-D 216C1	Gaffney		SC 85.12	17.2	76.0	9.12
WJESFM	CP 221A	Saluda		SC 52.52	136.6	42.0	10.52
WHCB	LIC 218C1	Bristol		TN 227.61	358.3	211.0	16.61
WWEVFM	LIC-D 218C2	Cumming		GA 194.32	265.8	177.0	17.32
WSGE.C	CP -D 219C2	Dallas		NC 141.65	36.3	117.0	24.65
WKCL	LIC 218C1	Ladson		SC 237.97	129.5	211.0	26.97
WUGA	LIC 219A	Athens		GA 121.16	245.1	89.0	32.16
RADD	ADD 221C3	Irmo		SC 81.56	108.4	43.0	38.56
WSGE	LIC 219A	Dallas		NC 129.47	37.3	89.0	40.47
WRAF	LIC-D 215C1	Toccoa Falls		GA 122.58	281.7	76.0	46.58
WWRKFM	LIC 221A	Elberton		GA 88.87	243.9	42.0	46.87
RDEL	DEL 221A	Elberton		GA 88.87	243.9	42.0	46.87
WLFA	LIC 217A	Asheville		NC 145.54	338.3	89.0	56.54
WGPH	LIC 218C2	Vidalia		GA 241.68	189.5	177.0	64.68
WFQS	LIC-D 217C3	Franklin		NC 164.78	302.7	99.0	65.78
ALLO	VAC 221A	Lavonia		GA 109.19	274.6	42.0	67.19

---

Breckenridge communications. LLC

REFERENCE  
33 00 24 N  
80 05 17 W

Irmo c3 proposal has no impact on WKCL's increase to a class C  
CH# 218C0 - 91.5 MHz, Pwr= 100 kW, HAAT=590.9 M, COR= 600 M  
Average Protected F(50-50)= 91.47 km  
Ave. F(50-10) 40 dBu= 197.2 54 dBu= 136.1 80 dBu= 50.0 100 dBu= 13.6

DISPLAY DATES  
DATA 10-18-02  
SEARCH 10-18-02

CH	CALL	TYPE	AZI.	DIST	LAT.	Pwr(kw)	COR(M)	PRO(km)	*IN*	*OUT*
CITY		STATE	<--	FILE #	LNG .	HAAT(M)	INT(km)	LICENSEE	(Overlap in km)	
218C1	WKCL	LIC SC	0.0 180.0	0.00 BLED19900227KA	33 00 24 80 05 17	100.000 93	104 145.2	49.5 Chapel Holly Spirit Church	-236.65<	-246.66<
217C1	WLTR	LIC SC	327.8 147.8	146.35 BLED1557	34 07 07 80 56 12	100.000 232	331 98.3	66.7 south Carolina Educational	-43.38<	-56.51<
219C2	WPG	LIC SC	10.6 190.6	126.70 BLED19930621KC	34 07 45 79 50 06	20.000 136	172 63.4	42.2 Augusta Radio Fellowship	-28.16<	-51.67<
217C	WHQR	LIC DC NC	54.1 234.1	216.06 BLED20010305AAH	34 07 53 78 11 17	100.000 348	362 111.3	75.9 Friends of public Radio, ■	13.34	4.00
218C2	WGPH	LIC CA	249.7 69.7	240.39 BLED19950426KB	32 14 02 82 28 52	40.000 155	225 133.5	50.9 Augusta Radio Fellowship ■	15.45	-7.61<
215C1	WLGI	LIC SC	41.4 221.4	105.90 BLED19840607BZ	33 43 09 79 19 50	50.000 154	159 6.0	52.7 Louis G. Gregory Bahai' I	8.39	39.60
221A	WBHCFM	LIC SC	259.7 79.7	98.71 BLH19980814KE	32 50 38 81 07 32	6.000 100	127 2.8	28.3 Hampton county Broadcaster	4.49	56.83
221C1	WMYB.C	CP SC	55.8 235.8	116.49 BPED20020717AAD	33 35 27 79 02 55	94.000 263	267 9.3	68.7 Nm Licensing, Lic	15.69	34.19
218A	WARA.C	CP SC	310.6 130.6	237.97 BPED19990825MB	34 23 01 82 03 23	0.285 100	276 45.7	13.3 Pensacola Christian Colleg	100.82	27.53
218A	AP218	APP GA	214.5 34.5	239.06 BNED20000222ACH	31 13 30 81 30 52	0.440 37	39 30.5	9.1 Gospel Radio Ministries, ■	117.06	32.80
219A	WLPE.A	APP GA	290.8 110.8	182.08 BPED20020920ADH	33 34 21 81 55 23	1.170 180	282 38.1	25.4 Augusta Radio Fellowship ■	52.51	20.59
219A	WLPE.A	APP GA	290.8 110.8	182.08 BPED20000403ABL	33 34 21 81 55 23	1.300 180	282 39.1	26.0 Augusta Radio Fellowship ■	51.51	19.96
219A	WLPE	LIC GA	291.8 111.8	185.20 BLED19880523KB	33 36 42 81 56 30	1.350 146	257 35.8	23.9 Augusta Radio Fellowship ■	57.92	25.19
218C	WUNC	LIC DCN NC	14.6 194.6	328.33 BLED19951213KA	35 51 59 79 10 00	100.000 415	564 184.1	80.9 The University Of North ca	52.78	50.31
221C2	WMYB	LIC NCN SC	54.0 234.0	136.35 BLH19980211KC	33 43 16 78 53 45	50.000 107	112 5.1	45.9 Nm Licensing, Lic	39.81	76.81
216C	WSVH	LIC GA	227.5 47.5	154.89 BLED19810417AH	32 03 32 81 17 57	100.000 323	330 10.5	74.1 Georgia public Telecommuni	52.94	67.21
220A	WLFS	LIC DC GA	227.1 47.1	138.40 BLED20010122AIX	32 09 17 81 09 55	6.000 55	58 2.2	21.6 Radio Training Network, In	44.73	103.23
221C3	*RADD	ADD SC	320.9 140.9	164.50	34 09 00 81 13 00	25.000 -90	0 2.3	22.7 Pro. Dist. = 91.14 km, Int Dist. = 13.48 km	71.08	128.35
271C2	WMXT	LIC ZEN SC	13.4 193.4	110.65 BLH19950208KA	33 58 35 79 48 30	50.000 146	174 0.0	51.7 cumulus Licensing Corp.	31.0R	79.7M
06+2C	WJBF	CP GA	285.7 105.7	168.99 BPCT19980909KE	33 24 18 81 50 15	100.000 489	563 0.0	119.4 Media General Broadcasting	TO Crd B= 49.56	

"\*" = ERP and HAAT on direct line to and from reference station. "<" = Contour Overlap

Doug Vernier Telecommunication Consultants

1600 Picturesque Dr. Cedar Falls, IA 50613

Breckenridge Communications, LLC

WLPE cannot upgrade to a C3 due to WAEG, Evans, GA

## REFERENCE

33 34 21 N  
81 55 23 W

CLASS = c3

Current Spacings

DISPLAY DATES

DATA 10-18-02

SEARCH 10-18-02

----- Channel 219 - 91.7 MHz -----

Call	Channel	Location		Dist	Azi	FCC	Margin
WLPE.A APP	219A	Augusta	GA	0.00	0.0	142.0	-142.00
WLPE.A APP-N	219A	Augusta	GA	0.00	0.0	142.0	-142.00
WLPE LIC	219A	Augusta	GA	4.68	338.4	142.0	-137.32
WUGA LIC	219A	Athens	GA	128.52	287.9	142.0	-13.48
WAEG LIC	222A	Evans	GA	28.67	274.0	42.0	-13.33
WARA.C CP -D	218A	Laurens	SC	90.81	352.3	89.0	1.81
WTBIFM LIC	219A	Greenville	SC	147.74	341.1	142.0	5.74
WEKL LIC	272A	Augusta	GA	21.62	226.1	12.0	9.62
RDEL DEL	221A	Saluda	SC	54.15	13.7	42.0	12.15
WJESFM LIC	221A	Saluda	SC	54.15	13.7	42.0	12.15
WJESFM CP	221A	Saluda	SC	57.08	24.6	42.0	15.08
WLPG LIC	219C2	Florence	SC	202.87	71.6	177.0	25.87
AP220 APP-N	220C3	Toombsboro	GA	127.98	244.9	99.0	28.98
WLTR LIC	217C1	Columbia	SC	109.56	56.0	76.0	33.56
WPEHFM LIC	221A	Louisville	GA	75.88	215.2	42.0	33.88
WKCL LIC	218C1	Ladson	SC	182.08	109.7	144.0	38.08
WVGS LIC	220A	Statesboro	GA	127.87	174.1	89.0	38.87
WSGE.C CP -D	219C2	Dallas	NC	216.17	19.4	177.0	39.17
WGPH LIC	218C2	Vidalia	GA	157.36	199.4	117.0	40.36
990514 APP	220A	Milledgeville	GA	132.47	245.6	89.0	43.47
RADD ADD	221C3	Irmo	SC	91.52	45.3	43.0	48.52
AP220 APP	220A	Milledgeville	GA	137.90	241.4	89.0	48.90

Doug Vernier Telecommunication Consultants  
 1600 Picturesque Dr. Cedar Falls, IA 50613  
 Breckenridge Communications, LLC

WLPG can increase to a full class C without any Impact from the Irmo Proposal

REFERENCE	CLASS = C	DISPLAY DATES
34 07 45 N		DATA 10-18-02
79 50 06 W	Current Spacings	SEARCH 10-18-02
----- Channel 219 - 91.7 MHz -----		

Call	Channel	Location	Dist	Azi	FCC	Margin
WLPG	LIC 219C2	Florence	SC 0.00	0.0	249.0	-249.00
WKCL	LIC 218C1	Ladson	SC 126.70	190.7	209.0	-82.30
WFSS	LIC-Z 220C1	Fayetteville	NC 135.86	39.2	209.0	-73.14
WSGE.C	CP -D 219C2	Dallas	NC 184.81	320.6	249.0	-64.19
980225	APP-D 216A	Dillon	SC 42.18	351.3	95.0	-52.82
980225	APP-D 216A	Dillon	SC 42.21	351.3	95.0	-52.79
WRCM	LIC-D 220C3	Wingate	NC 128.52	323.7	176.0	-47.48
WSGE	LIC 219A	Dallas	NC 180.40	317.0	226.0	-45.60
WUNC	LIC-D 218C	Chapel Hill	NC 202.15	17.3	241.0	-38.85
WLPE.A	APP 219A	Augusta	GA 202.87	252.8	226.0	-23.13
WLPE.A	APP-N 219A	Augusta	GA 202.87	252.8	226.0	-23.13
WLPE	LIC 219A	Augusta	GA 203.20	254.1	226.0	-22.80
WMYB.C	CP -N 221C1	Myrtle Beach	SC 94.13	129.3	105.0	-10.87
WMYB	LIC-N 221C2	Myrtle Beach	SC 97.93	117.4	<b>105.0</b>	-7.07
WLTR	LIC 217C1	Columbia	SC 101.64	269.6	105.0	-3.36
WRSH	LIC 216A	Rockingham	NC 91.69	6.9	95.0	-3.31
WTBIFM	LIC 219A	Greenville	SC 252.40	288.8	226.0	26.40
RADD	ADD 221C3	Irmo	SC 127.46	271.4	96.0	31.46
970109	APP 216A	Fayetteville	NC 136.12	38.2	95.0	41.12
WARA.C	CP -D 218A	Laurens	SC 206.55	278.5	165.0	41.55
WHQR	LIC-D 217C	Wilmington	NC 151.92	89.4	105.0	46.92
WRML	LIC 272A	Pageland	SC 80.68	331.1	29.0	51.68

DOU vernier Telecommunication consultants  
1608 Picturesque Dr. cedar Falls, IA 50613

## Breckenridge communications, LLC

WRCM can operate up to 100 kW toward Proposed Irmo C3  
CH# 220C - 91.9 MHZ, Pwr= 100 kW, HAAT=157.0 M, COR= 352 M  
Average Protected F(50-50)= 59.36 km

REFERENCE 35 03 33 N 80 40 14 W  
DISPLAY DATES DATA 10-30-02  
Ave. F(50-10) 40 dbu= 156.0 54 dbu= 89.0 80 dbu= 24.5 100 dbu= 7.3 SEARCH 10-30-02

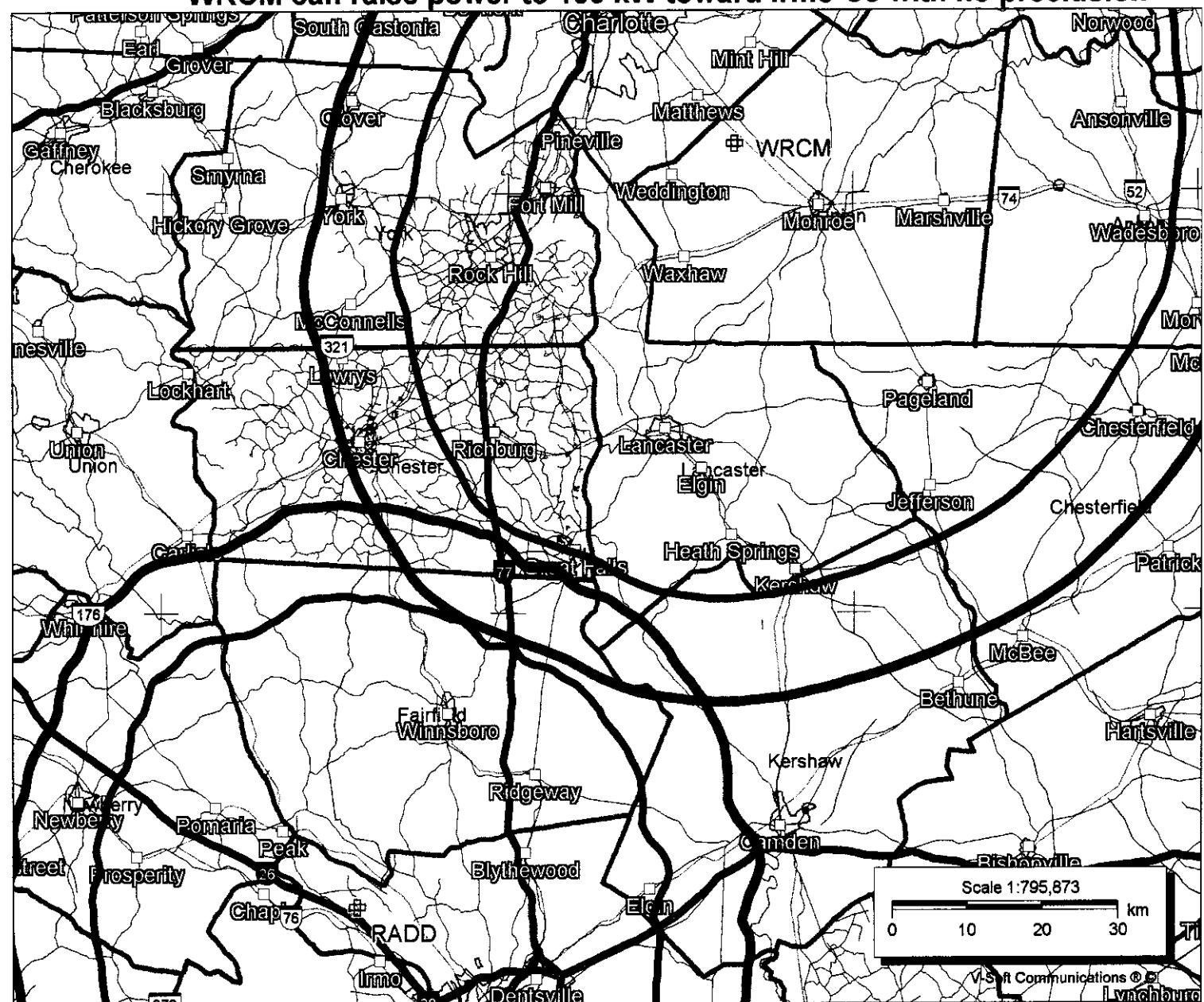
CH	CALL	TYPE	AZI.	DIST	LAT.	Pwr(kw)	COR(M)	PRO(km)	*IN*	*OUT*
CITY		STATE	<--	FILE #	LNG.	HAAT(M)	INT(km)	LICENSEE	(Overlap	in km)
220C3	WRCM Wingate	LIC NC	0.0 180.0	0.00 BLED19930602KA	35 03 33 80 40 14	10,000 157	352 103.7	39.1 Columbia Bible College Bro	-163.08<	-195.11<
219C2	WSGE.C Dallas	CP NC	313.0 133.0	56.92 BPED20000310ADH	35 24 26 81 07 48	6,000 260	500 63.7	43.0 Gaston college	-66.10<	-75.08<
219A	WSGE Dallas	LIC NC	300.4 120.4	54.92 BLED19801003AN	35 18 28 81 11 31	3,000 41	282 22.9	15.3 Gaston college	-27.33<	-49.46<
220C1	WFSS Fayetteville	LIC NC	89.0 269.0	162.35 BLED19930324KA	35 04 22 78 53 27	7,347 93	157 88.8	28.7 Fayetteville state univers	34.55 Pro. Dist. = 39.01 km, Int Dist. = 102.89 km	30.78<
221C3	RADD Irmo	ADD SC	206.5 26.5	112.61	34 09 00 81 13 00	25,000 35.6	100	22.7	18.25	2.25
219C2	WLPG Florence	LIC SC	143.3 323.3	128.52 BLED19930621KC	34 07 45 79 50 06	20,000 136	172 63.4	42.2 Augusta Radio Fellowship	5.76	-2.77<
220C2	WVTR Marion	LIC VA	343.3 163.3	195.90 BLED19911030KA	36 44 52 81 18 15	4,500 454	1355 126.5	51.7 Virginia Tech Foundation	10.00	-11.79
221A	ALLO Morganton	USE NC	309.3 129.3	122.63 RM8970	35 45 09 81 43 19	6,000 100	0 43.7	28.3	19.53	5.29
221A	WMNCFM Morganton	LIC NC	309.3 129.3	122.63 BMLH19900123KC	35 45 09 81 43 19	6,000 100	478 43.7	28.3 cooper Broadcasting Compan	19.53	5.29
221A	WIESFM saluda	CP SC	219.1 39.1	145.31 BPH20011018AFW	34 02 23 81 39 53	6,000 100	237 43.7	28.3 Breckenridge communication	42.21	27.97
221A	WIESFM saluda	LIC SC	222.5 42.5	151.83 BMLH19981120KD	34 02 48 81 47 01	3,000 100	245 36.6	24.2 Breckenridge Communication	55.84	38.56
221A	ALLO saluda	USE SC	222.5 42.5	151.83	34 02 48 81 47 01	6,000 100	0 43.7	28.3	48.73	34.49
221A	RDEL saluda	DEL SC	222.5 42.5	151.83	34 02 48 81 47 01	6,000 100	0 43.7	28.3	48.73	34.49
219A	WTBIFM Greenville	LIC SC	261.6 81.6	164.39 BLED19910610KA	34 49 51 82 26 55	3,700 128	414 43.1	28.3 Tabernacle Baptist Bible C	61.89	47.09
217C1	WLTR columbia	LIC SC	193.2 13.2	107.15 BLED1557	34 07 07 80 56 12	100,000 232	331 8.9	66.7 south Carolina Educational	38.89	33.15
222C	WRR Asheboro	LIC NC	41.1 221.1	114.64 BLH19851227KB	35 49 59 79 50 02	100,000 393	608 11.5	79.2 Dick Broadcasting company,	43.80	28.14
222C	ALLO Asheboro	USE NC	41.1 221.1	114.64 RM	35 49 59 79 50 02	100,000 600	0 13.7	91.8	41.58	15.56
221C1	WMYB.C Myrtle Beach	OP SC	137.2 317.2	220.93 BPH20020717AAD	33 35 27 79 02 55	94,000 263	267 100.6	68.7 Nm Licensing, Llc	61.01	63.17
06-T	W34BN charlotte	CP NC	334.0 154.0	26.85 BPTTL19991208AAE	35 16 35 80 48 02	0.180 169	353 0.0	31.9 Three Angels Broadcasting	To Grd B=	-5.09

"\*" = ERP and HAAT on direct line to and from reference station. "<" = Contour Overlap

## WRCM can raise power to 100 kW toward Irmo C3 with no preclusion

**WRCM**  
 BLE19930602KA  
 Latitude: 35-03-33 N  
 Longitude: 080-40-14 W  
 ERP: 100.00 kW  
 Channel: 220  
 Frequency: 91.9 MHz  
 AMSL Height: 352.0 m  
 Elevation: 212.9 m  
 HAAT: 157.0 m  
 Horiz. Pattern: Directional  
 Vert. Pattern: No  
 Prop Model: FCC

**RADD**  
 Latitude: 34-09-00 N  
 Longitude: 081-13-W W  
 ERP: 25.00 kW  
 Channel: 221  
 Frequency: 92.1 MHz  
 AMSL Height: 200.65 m  
 Elevation: 95.68 m  
 HAAT: 100.0 in  
 Horiz. Pattern: Omni  
 Vert. Pattern: No



Doug Vernier Telecommunication Consultants  
 1600 Picturesque Dr. Cedar Falls, IA 50613  
 Breckenridge Communications, LLC  
 WSGE upgraded to the next highest class

REFERENCE				CLASS = c3		DISPLAY DATES		
35	18	28	N	Current Spacings		DATA 10-18-02		
81	11	31	W	----- Channel 219 - 91 7 MHz -----		SEARCH 10-18-02		
WSGE.C	CP -D	219C2	Dallas	NC	12.39	26.9	177.0	-164.61
WSGE	LIC	219A	Dallas	NC	0.00	0.0	142.0	-142.00
WRCM	LIC-D	220C3	Wingate	NC	54.92	120.1	99.0	-44.08
WYFG	LIC-D	216C1	Gaffney	SC	57.48	248.3	76.0	-18.52
WTBIFM	LIC	219A	Greenville	SC	126.25	245.5	142.0	-15.75
WLPG	LIC	219C2	Florence	SC	180.40	136.2	177.0	3.40
WHCB	LIC	218C1	Bristol	TN	151.20	326.1	144.0	7.20
WUNC	LIC-D	218C	Chapel Hill	NC	193.74	70.7	176.0	17.74
WMNCFM	LIC	221A	Morganton	NC	68.89	316.0	42.0	26.89
WKRR	LIC-D	222C	Asheboro	NC	136.21	64.2	96.0	40.21
WARA.C	CP -D	218A	Laurens	SC	129.47	217.8	89.0	40.47
WVTR	LIC-D	220C2	Marion	VA	160.10	356.4	117.0	43.10
WXRI	LIC-D	217C2	Winston-salem	NC	110.90	33.8	56.0	54.90
WLTR	LIC	217C1	Columbia	SC	133.97	169.9	76.0	57.97
WLPE	LIC	219A	Augusta	GA	200.36	200.2	142.0	58.36
WLPE.A	APP-N	219A	Augusta	GA	203.88	199.4	142.0	61.88
WLPE.A	APP	219A	Augusta	GA	203.88	199.4	142.0	61.88
WFSS	LIC-Z	220C1	Fayetteville	NC	211.20	96.5	144.0	67.20
WVPB	LIC	219B	Beckley	WV	287.79	3.5	211.0	76.79
WRML.C	CP -N	272A	Pageland	SC	96.15	124.3	12.0	84.15
WUOT	LIC	220C	Knoxville	TN	260.58	288.1	176.0	84.58
RADD	ADD	221C3	Irmo	SC	128.45	181.0	43.0	85.45

Doug Vernier Telecommunication Consultants

1600 Picturesque Dr. Cedar Falls, IA 50613

Breckenridge Communications, LLC

WSGE Can upgrade to a class C with no impact from Irmo C3

## REFERENCE

35 18 28 N  
81 11 31 W

CLASS = C

Current Spacings

DISPLAY DATES

DATA 10-18-02  
SEARCH 10-18-02

----- Channel 219 - 91.7 MHz -----

Call	Channel	Location	Dist	Azi	FCC	Margin
WSGE.C	CP -D 219C2	Dallas	NC 12.39	26.9 249.0	-236.61	
WSGE	LIC 219A	Dallas	NC 0.00	0.0 226.0	-226.00	
WRCM	LIC-D 220C3	Wingate	NC 54.92	120.1 176.0	-121.08	
WTBIFM	LIC 219A	Greenville	SC 126.25	245.5 226.0	-99.75	
WLPG	LIC 219C2	Florence	SC 180.40	136.2 249.0	-68.60	
WHCB	LIC 218C1	Bristol	TN 151.20	326.1 209.0	-57.80	
WYFG	LIC-D 216C1	Gaffney	SC 57.48	248.3 105.0	-47.52	
WUNC	LIC-D 218C	Chapel Hill	NC 193.74	70.7 241.0	-47.26	
WARA.C	CP -D 218A	Laurens	SC 129.47	217.8 165.0	-35.53	
WVTR	LIC-D 220C2	Marion	VA 160.10	356.4 188.0	-27.90	
WMNCFM	LIC 221A	Morganton	NC 68.89	316.0 95.0	-26.11	
WLPE	LIC 219A	Augusta	GA 200.36	200.2 226.0	-25.64	
WLPE.A	APP-N 219A	Augusta	GA 203.88	199.4 226.0	-22.12	
WLPE.A	APP 219A	Augusta	<b>GA</b> 203.88	199.4 226.0	-22.12	
WFSS	LIC-Z 220C1	Fayetteville	NC 211.20	96.5 209.0	2.20	
WXRI	LIC-D 217C2	Winston-Salem	NC 110.90	33.8 105.0	5.90	
WVPB	LIC 219B	Beckley	WV 287.79	3.5 274.0	13.79	
WUGA	LIC 219A	Athens	GA 243.28	231.2 226.0	17.28	
WUOT	LIC 220C	Knoxville	TN 260.58	288.1 241.0	19.58	
WLTR	LIC 217C1	Columbia	SC 133.97	169.9 105.0	28.97	
WPINFM	LIC 218A	Dublin	VA 194.69	11.7 165.0	29.69	
WKRR	LIC-D 222C	Asheboro	<b>NC</b> 136.21	64.2 105.0	31.21	
RADD	ADD 221C3	Irmo	SC 128.45	181.0 96.0	32.45	

Doug Vernier Telecommunication Consultants  
 1600 Picturesque Dr. Cedar Falls, IA 50613  
 Breckenridge Communications, LLC

WTBI can upgrade to a class C with no impact from the Irmo C3 proposal

REFERENCE	CLASS = C	DISPLAY DATES
34 49 51 N		DATA 10-18-02
82 26 55 W	Current Spacings	SEARCH 10-18-02
----- Channel 219 - 91 7 MHz -----		

Call	Channel	Location	Dist	Azi	FCC	Margin
WTBIFM	LIC 219A	Greenville	SC 0.00	0.0	226.0	-226.00
WSGE.C	CP -D 219C2	Dallas	NC 136.15	61.5	249.0	-112.85
WARA.C	CP -D 218A	Laurens	SC 61.28	144.1	165.0	-103.72
WUGA	LIC 219A	Athens	GA 124.83	216.1	226.0	-101.17
WSGE	LIC 219A	Dallas	NC 126.25	64.8	226.0	-99.75
WLPE	LIC 219A	Augusta	GA 143.07	160.9	226.0	-82.93
WLPE.A	APP-N 219A	Augusta	GA 147.74	160.8	226.0	-78.26
WLPE.A	APP 219A	Augusta	GA 147.74	160.8	226.0	-78.26
WUOT	LIC 220C	Knoxville	TN 187.93	314.5	241.0	-53.07
AP220	APP 220A	Pendergrass	GA 128.64	237.7	165.0	-36.36
WYFG	LIC-D 216C1	Gaffney	SC 68.89	62.4	105.0	-36.11
990630	APP 220A	Pendergrass	GA 129.45	238.5	165.0	-35.55
WHCB	LIC 218C1	Bristol	TN 180.15	9.0	209.0	-28.85
WWEVFM	LIC-D 218C2	Cumming	GA 170.37	247.6	188.0	-17.63
WRCM	LIC-D 220C3	Wingate	NC 164.39	80.6	176.0	-11.61
ALLO	VAC 221A	Lavonia	GA 83.63	240.4	95.0	-11.37
WLFA	LIC 217A	Asheville	NC 87.38	347.9	95.0	-7.62
WCCV	LIC-D 219C2	Cartersville	GA 249.12	253.3	249.0	0.12
WMYI	LIC 273C1	Hendersonville	NC 44.38	348.1	41.0	3.38
WLPG	LIC 219C2	Florence	SC 252.40	107.3	249.0	3.40
RDEL	DEL 221A	Elberton	GA 98.97	206.1	95.0	3.97
WWRKFM	LIC 221A	Elberton	GA 98.97	206.1	95.0	3.97
WJESFM	LIC 221A	Saluda	SC 106.31	144.8	95.0	11.31
RDEL	DEL 221A	Saluda	SC 106.31	144.8	95.0	11.31
WFQS	LIC-D 217C3	Franklin	NC 110.14	290.6	96.0	14.14
WJESFM	CP 221A	Saluda	SC 113.54	140.5	95.0	18.54
970416	APP 219A	Griffin	GA 245.88	224.6	226.0	19.88
961104	APP-D 219C3	Peachtree City	GA 260.59	228.8	237.0	23.59
970416	APP-D 219C3	Peachtree City	GA 260.61	228.7	237.0	23.61
WMNCFM	LIC 221A	Morganton	NC 121.76	32.6	95.0	26.76
AP220	APP-N 220C3	Toomsboro	GA 205.38	198.9	176.0	29.38
970416	APP 219A	Peachtree City	GA 260.59	228.8	226.0	34.59
RADD	ADD 221C3	Irmo	SC 136.05	123.5	96.0	40.05

Doug Vernier Telecommunication Consultants  
**1600 Picturesque Dr.** Cedar Falls, IA 50613  
 Breckenridge Communications, LLC  
 C3, Irmo Proposal has no impact on WUNC

REFERENCE	CLASS = C	DISPLAY DATES
35 51 59 N		DATA 10-18-02
79 10 00 W	Current Spacings	SEARCH 10-18-02
----- Channel 218 - 91.5 MHz -----		

Call	Channel	Location	Dist	Azi	FCC	Margin
WUNC	LIC-D 218C	Chapel Hill	NC	0.00	0.0	290.0
WXRI	LIC-D 217C2	Winston-Salem	NC	124.20	284.3	188.0
WPINFM	LIC 218A	Dublin	VA	191.24	312.8	226.0
WHQR	LIC-D 217C	Wilmington	NC	212.20	154.9	241.0
WBJD.A	APP-D 218C1	Atlantic Beach	NC	243.51	119.7	270.0
WQFS	LIC 215A	Greensboro	NC	69.89	291.5	95.0
WPGT.C	CP -D 217C3	Roanoke Rapids	NC	151.91	63.3	176.0
WFSS	LIC-Z 220C1	Fayetteville	NC	91.54	164.1	105.0
WLUR	LIC-D 218A	Lexington	VA	214.67	353.5	226.0
WLUR.A	APP 218A	Lexington	VA	215.48	353.4	226.0
WBKU	LIC-D 219C2	Ahsokie	NC	178.44	81.2	188.0
970109	APP-D 216A	Wade	NC	85.82	149.8	95.0
960328	APP 219A	Rustburg	VA	157.60	2.4	165.0
WOKDFM	LIC-D 216C2	Danville	VA	99.09	348.7	105.0
970109	APP 216A	Fayetteville	NC	89.34	164.9	95.0
WBJD	LIC-D 218C2	Atlantic Beach	NC	243.51	119.7	249.0
WSGE.C	CP -D 219C2	Dallas	NC	184.99	254.5	188.0
960806	APP 216A	Fayetteville	NC	93.99	153.2	95.0
960327	APP 219C3	Lynchburg	VA	175.92	2.6	176.0
WZMB	LIC 217A	Greenville	NC	165.67	99.8	165.0
950628	APP 219C3	Lynchburg	VA	178.37	4.5	176.0
WHCB	LIC 218C1	Bristol	TN	274.39	284.2	270.0
WPAR	LIC-D 217C3	Salem	VA	180.49	338.2	176.0
WMLU	LIC 217A	Farmville	VA	173.15	23.2	165.0
WMLU.C	CP 217A	Farmville	VA	174.84	22.9	165.0
WLPG	LIC 219C2	Florence	SC	202.15	197.7	188.0
WRSH	LIC 216A	Rockingham	NC	113.22	206.1	95.0
WYCS.C	CP 218B1	Yorktown	VA	281.07	57.2	259.0
WYCS	LIC 218B1	Yorktown	VA	281.07	57.2	259.0
WSGE	LIC 219A	Dallas	NC	193.74	251.9	165.0
WRQM	LIC 215C3	Rocky Mount	NC	128.82	92.3	96.0
WRSV	LIC 221A	Rocky Mount	NC	128.82	92.3	95.0
WJMH	LIC 271C	Reidsville	NC	83.21	303.4	48.0
RDEL	DEL 271C	Reidsville	NC	83.21	303.4	48.0
RADD	ADD 271C0	Reidsville	NC	83.21	303.4	45.0
WLTR	LIC 217C1	Columbia	SC	252.41	220.2	209.0
AP218	APP 218A	Hillsboro	WV	273.39	340.8	226.0
WVSTFM	LIC-D 217A	Petersburg	VA	218.49	45.2	165.0
WPEX	LIC 215A	Kenbridge	VA	151.39	39.4	95.0
WPGT	LIC 216A	Roanoke Rapids	NC	151.91	63.3	95.0
WKCL	LIC 218C1	Ladson	SC	328.33	195.1	270.0
RADD	ADD 272A	Smithfield	NC	87.56	119.8	29.0
WVPB	LIC 219B	Beckley	WV	277.73	324.9	217.0
						60.73

## Attachment 2, Pg 12

Call	Channel	Location		Dist	Azi	FCC	Margin
WRCM	LIC-D 220C3	Wingate	NC	163.27	237.1	96.0	67.27
WWMC	LIC 215A	Lynchburg	VA	164.51	360.0	95.0	69.51
980225	APP-D 216A	Dillon	SC	165.30	204.1	95.0	70.30
980225	APP-D 216A	Dillon	SC	165.33	204.1	95.0	70.33
WKIX	LIC 272A	Goldsboro	NC	106.92	118.9	29.0	77.92
WARN	LIC 218A	Culpeper	VA	305.73	19.6	226.0	79.73
WARA.C	CP -D 218A	Laurens	SC	310.55	238.7	226.0	84.55
RDEL	DEL 272A	Goldsboro	NC	116.92	116.2	29.0	87.92
WSIF.C	CP 215A	Wilkesboro	NC	184.34	280.0	95.0	89.34
AP217	APP-D 217A	Middlebrook	VA	255.46	357.1	165.0	90.46
WVTR	LIC-D 220C2	Marion	VA	215.46	297.7	105.0	110.46
WFNCFM	LIC 272A	Lumberton	NC	141.29	174.2	29.0	112.29
RDEL	DEL 272A	Roanoke Rapids	NC	146.01	60.5	29.0	117.01
WPTM	LIC 272A	Roanoke Rapids	NC	146.01	60.5	29.0	117.01
WAAE	LIC 220A	New Bern	NC	212.06	111.9	95.0	117.06
RADD	ADD 272A	Garysburg	NC	152.78	62.5	29.0	123.78
960417	APP 216C3	Aurora	NC	219.90	107.2	96.0	123.90
WEMC	LIC 219A	Harrisonburg	VA	290.29	4.9	165.0	125.29
WRML.C	CP -N 272A	Pageland	SC	156.76	222.3	29.0	127.76
WRML	LIC 272A	Pageland	SC	157.67	219.4	29.0	128.67
950905	APP 216C3	Aurora	NC	226.56	105.4	96.0	130.56
WPIB	LIC-D 216C1	Bluefield	WV	237.19	311.3	105.0	132.19
WLGI	LIC 215C1	Hemingway	SC	238.67	183.6	105.0	133.67
WMYB	LIC-N 221C2	Myrtle Beach	SC	239.27	174.0	105.0	134.27
WMNCFM	LIC 221A	Morganton	NC	231.30	267.6	95.0	136.30
WTJU	LIC 216B1	Charlottesville	VA	242.52	14.3	105.0	137.52
AP220	APP 220A	Wakefield	VA	233.03	58.0	95.0	138.03
WCDX	LIC-N 221B1	Mechanicsville	VA	243.67	36.6	105.0	138.67
WYFG	LIC-D 216C1	Gaffney	SC	251.19	251.3	105.0	146.19
WNRN	LIC-N 220A	Charlottesville	VA	242.52	14.3	95.0	147.52
WMYB.C	CP -N 221C1	Myrtle Beach	SC	252.66	177.5	105.0	147.66
WLFA	LIC 217A	Asheville	NC	316.68	265.7	165.0	151.68
WHCE	LIC 216A	Highland Springs	VA	248.05	40.9	95.0	153.05
WTBIFM	LIC 219A	Greenville	SC	319.69	249.8	165.0	154.69
960328	APP-D 218A	Hurricane	WV	381.96	319.5	226.0	155.96
WTRM	LIC-D 217B	Winchester	VA	374.45	10.3	217.0	157.45
WCWM.C	CP -D 215A	Williamsburg	VA	252.68	50.2	95.0	157.68
WNSB	LIC 216B1	Norfolk	VA	269.28	67.1	105.0	164.28
RADD	ADD 221C3	Irmo	SC	266.97	225.0	96.0	170.97

Doug Vernier Telecommunication Consultants  
 1600 Picturesque Dr. Cedar Falls, IA 50613

Breckenridge Communications LLP

Application at Toombsboro receives no impact from Irmo C3 Proposal

REFERENCE			CLASS = C		DISPLAY DATES
33 04 41 N			Former Spacings		DATA 10-31-02
83 09 54 W			Channel 220 - 91.9 MHz		SEARCH 10-31-02

Call	Channel	Location	Dist	Azi	FCC	Margin
AP220	APP-N 220C3	Toombsboro	GA 0.00	0.0	237.0	-237.00
990514	APP 220A	Milledgeville	GA 4.79	265.2	222.0	-217.21
AP220	APP 220A	Milledgeville	GA 12.70	203.8	222.0	-209.30
WPEHFM	LIC 221A	Louisville	GA 72.51	95.5	161.0	-88.49
ALLO	USE 221A	Louisville	GA 72.51	95.5	161.0	-88.49
990630	APP 220A	Pendergrass	GA 133.95	340.7	222.0	-88.05
WCLK	LIC-D 220A	Atlanta	GA 137.43	303.2	222.0	-84.57
ALLO	USE 221A	Jackson	GA 77.93	286.7	161.0	-83.07
WJGAFM	LIC 221A	Jackson	GA 77.93	286.7	161.0	-83.07
WVGS	LIC 220A	Statesboro	GA 148.38	118.9	222.0	-73.62
WUGA	LIC 219A	Athens	GA 93.71	355.4	161.0	-67.29
981203	APP-D 220A	La Grange	GA 166.33	268.5	222.0	-55.67
970416	APP 219A	Griffin	GA 107.80	280.0	161.0	-53.20
980604	APP-D 220A	La Grange	GA 168.88	262.8	222.0	-53.12
ALLO	USE 221A	Elberton	GA 107.89	12.0	161.0	-53.11
WWRKFM	LIC 221A	Elberton	GA 107.89	12.0	161.0	-53.11
RDEL	DEL 221A	Elberton	GA 107.89	12.0	161.0	-53.11
981203	APP-D 220A	La Grange	GA 174.29	269.0	222.0	-47.71
981202	APP 220A	La Grange	GA 174.40	267.7	222.0	-47.60
970416	APP-D 219C3	Peachtree City	GA 131.39	279.6	176.0	-44.61
961104	APP-D 219C3	Peachtree City	GA 131.40	279.6	176.0	-44.60
ALLO	USE 222A	Macon	GA 51.45	231.3	94.0	-42.55
ALLO	VAC 221A	Vienna	GA 122.24	209.2	161.0	-38.76
WMKS	LIC-N 222A	Macon	GA 55.60	232.6	94.0	-38.40
WLPE.A	APP 219A	Augusta	GA 127.98	64.2	161.0	-33.02
WLPE.A	APP-N 219A	Augusta	GA 127.98	64.2	161.0	-33.02
WLPE	LIC 219A	Augusta	GA 128.34	62.1	161.0	-32.66
970416	APP 219A	Peachtree City	GA 131.40	279.6	161.0	-29.60
WASW.C	CP -N 220C2	Waycross	GA 219.75	159.6	249.0	-29.25
WJTG	LIC 217C1	Fort Valley	GA 78.13	236.7	105.0	-26.87
ALLO	USE 222A	Bostwick	GA 82.68	334.5	94.0	-11.32
WMOQ	LIC 222A	Bostwick	GA 82.97	334.0	94.0	-11.03
990224	APP 220A	Cuthbert	GA 211.91	226.5	222.0	-10.09
WLFS	LIC-D 220A	Port Wentworth	GA 213.80	118.2	222.0	-8.20
ALLO	VAC 221A	Lavonia	GA 153.13	357.4	161.0	-7.87
WASW	LIC 220A	Waycross	GA 219.75	159.6	222.0	-2.25
WPMA	LIC 274A	Sparta	GA 30.23	30.2	28.0	2.23
ALLO	USE 221A	Saluda	SC 167.32	49.5	161.0	6.32
WJESFM	LIC 221A	Saluda	SC 167.32	49.5	161.0	6.32
980727	APP 220A	Eufaula	AL 228.32	235.8	222.0	6.32
RDEL	DEL 221A	Saluda	SC 167.32	49.5	161.0	6.32
WGPH	LIC 218C2	Vidalia	GA 113.49	145.5	105.0	8.49
ALLO	USE 222A	Evans	GA 103.04	57.4	94.0	9.04

Call	Channel	Location		Dist	Azi	FCC	Margin	
WAEG	LIC	222A	Evans	GA	103.86	56.5	94.0	9.86
WJESFM	CP	221A	Saluda	SC	175.46	52.0	161.0	14.46
WEKS	LIC	223A	Zebulon	GA	108.75	270.9	94.0	14.75
ALLO	USE	223A	Zebulon	GA	109.98	271.2	94.0	15.98
WUNV	LIC	219A	Albany	GA	177.08	208.4	161.0	16.08
WPMA.C	CP	274C3	Buckhead	GA	47.63	349.4	31.0	16.63
WPMA.A	APP	274C3	Buckhead	GA	47.92	349.4	31.0	16.92
WPMA.A	APP	274C3	Buckhead	GA	47.92	349.4	31.0	16.92
ALLO	USE	221A	Carrollton	GA	180.73	288.0	161.0	19.73
WBTRFM	LIC	221A	Carrollton	GA	180.73	288.0	161.0	19.73
ALLO	VAC	274C3	Buckhead	GA	51.73	344.7	31.0	20.73
WCCV	LIC-D	219C2	Cartersville	GA	211.09	305.3	188.0	23.09
WTJB	LIC	219A	Columbus	GA	189.36	247.8	161.0	28.36
WLJSFM	CP -D	220A	Jacksonville	AL	253.14	290.2	222.0	31.14
WBHCFM	LIC	221A	Hampton	SC	192.44	97.2	161.0	31.44
ALLO	USE	221A	Hampton	SC	192.54	97.2	161.0	31.54
WLJSFM	LIC	220A	Jacksonville	AL	255.41	289.7	222.0	33.41
ALLO	USE	273A	Warner Robins	GA	68.20	218.3	28.0	40.20
RADD	ADD	221C3	Irmo	SC	216.40	56.0	176.0	40.40

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AP220, Milledgeville, GA receives no preclusive impact from Irmo C3 proposal

REFERENCE				DISPLAY DATES			
32 58 24 N		CLASS = A		DATA	10-31-02		
83 13 12 W		Former Spacings		SEARCH	10-31-02		
----- Channel 220 - 91.9 MHz -----							
Call	Channel	Location		Dist	Azi	FCC	Margin
AP220 APP-N 220C3	Toombsboro	GA	12.70	23.8	138.0	-125.30	
AP220 APP 220A	Milledgeville	GA	0.00	0.0	105.0	-105.00	
990514 APP 220A	Milledgeville	GA	11.22	1.8	105.0	-93.78	
WJTG LIC 217C1	Fort Valley	GA	67.83	242.6	74.0	-6.17	
WJGAFM LIC 221A	Jackson	GA	77.37	296.1	64.0	13.37	
ALLO USE 221A	Jackson	GA	77.37	296.1	64.0	13.37	
ALLO USE 221A	Louisville	GA	77.47	86.5	64.0	13.47	
WPEHFM LIC 221A	Louisville	GA	77.47	86.5	64.0	13.47	
ALLO USE 222A	Macon	GA	40.61	239.5	27.0	13.61	
WMKS LIC-N 222A	Macon	GA	44.90	240.5	27.0	17.90	
WPMA LIC 274A	Sparta	GA	42.87	28.2	8.0	34.87	
WCLK LIC-D 220A	Atlanta	GA	140.03	308.4	105.0	35.03	
990630 APP 220A	Pendergrass	GA	143.46	344.1	105.0	38.46	
WUGA LIC 219A	Athens	GA	105.05	358.7	64.0	41.05	
970416 APP 219A	Griffin	GA	105.47	286.7	64.0	41.47	
WVGS LIC 220A	Statesboro	GA	147.83	114.0	105.0	42.83	
970416 APP-D 219C3	Peachtree City	GA	128.84	285.1	84.0	44.84	
961104 APP-D 219C3	Peachtree City	GA	128.85	285.1	84.0	44.85	

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990514 application receives no preclusive impact from Irmo proposal.

## REFERENCE

33 04 28 N

CLASS = C

DISPLAY DATES

83 12 58 W

Former Spacings

DATA 10-31-02

----- Channel 220 - 91.9 MHz -----

SEARCH 10-31-02

Call	Channel	Location		Dist	Azi	FCC	Margin
AP220	APP-N 220C3	Toombsboro	GA	4.79	85.2	237.0	-232.21
990514	APP 220A	Milledgeville	GA	0.00	0.0	222.0	-222.00
AP220	APP 220A	Milledgeville	GA	11.22	181.8	222.0	-210.78
990630	APP 220A	Pendergrass	GA	132.82	342.7	222.0	-89.18
WCLK	LIC-D 220A	Atlanta	GA	133.68	304.5	222.0	-88.32
ALLO	USE 221A	Jackson	GA	73.49	288.1	161.0	-87.51
WJGAFM	LIC 221A	Jackson	GA	73.49	288.1	161.0	-87.51
WPEHFM	LIC 221A	Louisville	GA	77.23	94.8	161.0	-83.77
ALLO	USE 221A	Louisville	GA	77.23	94.8	161.0	-83.77
WVGS	LIC 220A	Statesboro	GA	152.39	117.9	222.0	-69.61
WUGA	LIC 219A	Athens	GA	93.85	358.3	161.0	-67.15
981203	APP-D 220A	La Grange	GA	161.55	268.5	222.0	-60.45
980604	APP-D 220A	La Grange	GA	164.09	262.7	222.0	-57.91
970416	APP 219A	Griffin	GA	103.17	280.7	161.0	-57.83
981203	APP-D 220A	La Grange	GA	169.51	269.1	222.0	-52.49
981202	APP 220A	La Grange	GA	169.61	267.7	222.0	-52.39
ALLO	USE 221A	Elberton	GA	109.38	14.4	161.0	-51.62
WWRKFM	LIC 221A	Elberton	GA	109.38	14.4	161.0	-51.62
RDEL	DEL 221A	Elberton	GA	109.38	14.4	161.0	-51.62
961104	APP-D 219C3	Peachtree City	GA	126.76	280.1	176.0	-49.24
970416	APP-D 219C3	Peachtree City	GA	126.76	280.1	176.0	-49.24
ALLO	USE 222A	Macon	GA	47.55	228.0	94.0	-46.45
WMKS	LIC-N 222A	Macon	GA	51.62	229.8	94.0	-42.38
ALLO	VAC 221A	Vienna	GA	119.62	207.3	161.0	-41.38
970416	APP 219A	Peachtree City	GA	126.76	280.1	161.0	-34.24
WJTG	LIC 217C1	Fort Valley	GA	73.95	234.9	105.0	-31.05
WLPE.A	APP 219A	Augusta	GA	132.47	64.9	161.0	-28.53
WLPE.A	APP-N 219A	Augusta	GA	132.47	64.9	161.0	-28.53
WLPE	LIC 219A	Augusta	GA	132.76	62.9	161.0	-28.24
WASW.C	CP -N 220C2	Waycross	GA	221.09	158.4	249.0	-27.91
990224	APP 220A	Cuthbert	GA	208.19	225.6	222.0	-13.81
ALLO	USE 222A	Bostwick	GA	81.11	337.7	94.0	-12.89
WMOQ	LIC 222A	Bostwick	GA	81.35	337.2	94.0	-12.65
ALLO	VAC 221A	Lavonia	GA	153.39	359.2	161.0	-7.61
WLFS	LIC-D 220A	Port Wentworth	GA	217.84	117.5	222.0	-4.16
WASW	LIC 220A	Waycross	GA	221.09	158.4	222.0	-0.91
980727	APP 220A	Eufaula	AL	224.15	235.2	222.0	2.15
WPMA	LIC 274A	Sparta	GA	33.21	36.9	28.0	5.21
WEKS	LIC 223A	Zebulon	GA	103.99	271.2	94.0	9.99
WJESFM	LIC 221A	Saluda	SC	171.24	50.4	161.0	10.24
RDEL	DEL 221A	Saluda	SC	171.24	50.4	161.0	10.24
ALLO	USE 221A	Saluda	SC	171.24	50.4	161.0	10.24
WGPH	LIC 218C2	Vidalia	GA	115.95	143.4	105.0	10.95

## Attachment 2, Pg 17

Call	Channel	Location		Dist	Azi	FCC	Margin
ALLO	USE 223A	Zebulon	GA	105.21	271.5	94.0	11.21
ALLO	USE 222A	Evans	GA	107.31	58.6	94.0	13.31
WUNV	LIC 219A	Albany	GA	174.49	207.1	161.0	13.49
WAEG	LIC 222A	Evans	GA	108.09	57.7	94.0	14.09
ALLO	USE 221A	Carrollton	GA	176.32	288.5	161.0	15.32
WBTRFM	LIC 221A	Carrollton	GA	176.32	288.5	161.0	15.32
WPMA.C	CP 274C3	Buckhead	GA	47.37	355.1	31.0	16.37
WPMA.A	APP 274C3	Buckhead	GA	47.67	355.1	31.0	16.67
WPMA.A	APP 274C3	Buckhead	GA	47.67	355.1	31.0	16.67
WJESFM	CP 221A	Saluda	SC	179.49	52.8	161.0	18.49
WCCV	LIC-D 219C2	Cartersville	GA	207.44	306.1	188.0	19.44
ALLO	VAC 274C3	Buckhead	GA	51.07	349.9	31.0	20.07
WTJB	LIC 219A	Columbus	GA	184.79	247.4	161.0	23.79
WLJSFM	CP -D 220A	Jacksonville	AL	248.81	290.6	222.0	26.81
WLJSFM	LIC 220A	Jacksonville	AL	251.05	290.1	222.0	29.05
WBHCFM	LIC 221A	Hampton	SC	197.13	96.9	161.0	36.13
ALLO	USE 221A	Hampton	SC	197.23	96.9	161.0	36.23
ALLO	USE 273A	Warner Robins	GA	65.02	215.2	28.0	37.02
<b>WUOT</b>	LIC 220C	Knoxville	TN	331.83	348.7	290.0	41.83
WELVFM	LIC-N 273A	Warner Robins	GA	70.08	217.4	28.0	42.08
RADD	ADD 221C3	Irmo	SC	220.60	56.6	176.0	44.60

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AP220, Milledgeville, GA receives no preclusion from Irmo, C3

REFERENCE				DISPLAY DATES			
32	58	24	N	CLASS = C	DATA	10-31-02	
83	13	12	W	Former Spacings	SEARCH	10-31-02	
<hr/>							
				Channel 220 - 91.9 MHz			
Call	Channel	Location		Dist	Azi	FCC	Margin
AP220	APP-N 220C3	Toombsboro	GA	12.70	23.8	237.0	-224.30
AP220	APP 220A	Milledgeville	GA	0.00	0.0	222.0	-222.00
990514	APP 220A	Milledgeville	GA	11.22	1.8	222.0	-210.78
ALLO	USE 221A	Jackson	GA	77.37	296.1	161.0	-83.63
WJGAFM	LIC 221A	Jackson	GA	77.37	296.1	161.0	-83.63
ALLO	USE 221A	Louisville	GA	77.47	86.5	161.0	-83.53
WPEHFM	LIC 221A	Louisville	GA	77.47	86.5	161.0	-83.53
WCLK	LIC-D 220A	Atlanta	GA	140.03	308.4	222.0	-81.97
990630	APP 220A	Pendergrass	GA	143.46	344.1	222.0	-78.54
WVGS	LIC 220A	Statesboro	GA	147.83	114.0	222.0	-74.17
981203	APP-D 220A	La Grange	GA	161.29	272.5	222.0	-60.71
980604	APP-D 220A	La Grange	GA	162.69	266.6	222.0	-59.31
WUGA	LIC 219A	Athens	GA	105.05	358.7	161.0	-55.95
970416	APP 219A	Griffin	GA	105.47	286.7	161.0	-55.53
ALLO	USE 222A	Macon	GA	40.61	239.5	94.0	-53.39
981202	APP 220A	La Grange	GA	169.18	271.6	222.0	-52.82
981203	APP-D 220A	La Grange	GA	169.34	272.9	222.0	-52.66
ALLO	VAC 221A	Vienna	GA	109.61	209.8	161.0	-51.39
WMKS	LIC-N 222A	Macon	GA	44.90	240.5	94.0	-49.10
970416	APP-D 219C3	Peachtree City	GA	128.84	285.1	176.0	-47.16
961104	APP-D 219C3	Peachtree City	GA	128.85	285.1	176.0	-47.15
WWRKFM	LIC 221A	Elberton	GA	120.35	13.2	161.0	-40.65
RDEL	DEL 221A	Elberton	GA	120.35	13.2	161.0	-40.65
ALLO	USE 221A	Elberton	GA	120.35	13.2	161.0	-40.65
WASW.C	CP -N 220C2	Waycross	GA	210.85	157.2	249.0	-38.15
WJTG	LIC 217C1	Fort Valley	GA	67.83	242.6	105.0	-37.17
970416	APP 219A	Peachtree City	GA	128.85	285.1	161.0	-32.15
WLPE.A	APP-N 219A	Augusta	GA	137.90	60.7	161.0	-23.10
WLPE.A	APP 219A	Augusta	GA	137.90	60.7	161.0	-23.10
WLPE	LIC 219A	Augusta	GA	138.53	58.8	161.0	-22.47
990224	APP 220A	Cuthbert	GA	200.26	227.9	222.0	-21.74
WASW	LIC 220A	Waycross	GA	210.85	157.2	222.0	-11.15
WLFS	LIC-D 220A	Port Wentworth	GA	213.25	114.7	222.0	-8.75
980727	APP 220A	Eufaula	AL	217.66	237.5	222.0	-4.34
ALLO	USE 222A	Bostwick	GA	91.45	340.6	94.0	-2.55
WMOQ	LIC 222A	Bostwick	GA	91.66	340.1	94.0	-2.34
WGPH	LIC 218C2	Vidalia	GA	107.40	139.7	105.0	2.40
WUNV	LIC 219A	Albany	GA	164.42	208.8	161.0	3.42
ALLO	VAC 221A	Lavonia	GA	164.60	359.3	161.0	3.60
WEKS	LIC 223A	Zebulon	GA	104.45	277.3	94.0	10.45
ALLO	USE 223A	Zebulon	GA	105.73	277.6	94.0	11.73
WPMA	LIC 274A	Sparta	GA	42.87	28.2	28.0	14.87
WJESFM	LIC 221A	Saluda	SC	178.84	47.7	161.0	17.84

## Attachment 2, Pg 19 -

Call	Channel	Location		Dist	Azi	FCC	Margin
ALLO	USE 221A	Saluda	SC	178.84	47.7	161.0	17.84
RDEL	DEL 221A	Saluda	SC	178.84	47.7	161.0	17.84
WBTRFM	LIC 221A	Carrollton	GA	179.85	292.0	161.0	18.85
ALLO	USE 221A	Carrollton	GA	179.85	292.0	161.0	18.85
WTJB	LIC 219A	Columbus	GA	180.45	250.6	161.0	19.45
ALLO	USE 222A	Evans	GA	113.84	53.8	94.0	19.84
WAEG	LIC 222A	Evans	GA	114.75	53.0	94.0	20.75
WJESFM	CP 221A	Saluda	SC	186.74	50.1	161.0	25.74
WCCV	LIC-D 219C2	Cartersville	GA	213.94	308.6	188.0	25.94
WPMA.C	CP 274C3	Buckhead	GA	58.53	356.4	31.0	27.53
WPMA.A	APP 274C3	Buckhead	GA	58.82	356.4	31.0	27.82
WPMA.A	APP 274C3	Buckhead	GA	58.82	356.4	31.0	27.82
ALLO	USE 273A	Warner Robins	GA	56.00	221.5	28.0	28.00
WLJSFM	CP -D 220A	Jacksonville	AL	252.63	293.1	222.0	30.63
ALLO	VAC 274C3	Buckhead	GA	62.09	352.1	31.0	31.09
WLJSFM	LIC 220A	Jacksonville	AL	254.78	292.5	222.0	32.78
WELVFM	LIC-N 273A	Warner Robins	GA	61.31	223.5	28.0	33.31
WBHCFM	LIC 221A	Hampton	SC	196.46	93.6	161.0	35.46
ALLO	USE 221A	Hampton	SC	196.56	93.6	161.0	35.56
990510	APP 220A	Monticello	FL	264.32	195.1	222.0	42.32
WKVH.C	CP 220A	Monticello	FL	264.32	195.1	222.0	42.32
WDDQ	LIC 221A	Adel	GA	204.23	184.7	161.0	43.23
ALLO	USE 221A	Adel	GA	204.23	184.7	161.0	43.23
<b>RADD</b>	ADD 221C3	Irmo	SC	227.24	54.3	176.0	51.24
WUOT	LIC 220C	Knoxville	TN	342.76	349.1	290.0	52.76
WTBIFM	LIC 219A	Greenville	SC	218.03	18.8	161.0	57.03

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Proposed Irmo C3 upgrade has no preclusive impact on WUGA, Athens

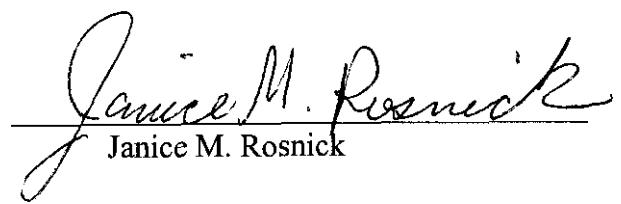
REFERENCE				DISPLAY DATES			
33	55	13	N	CLASS = C	DATA	10-31-02	
83	14	46	W	Former Spacings	SEARCH	10-31-02	
----- Channel 220 - 91.9 MHz -----							

Call	Channel	Location		Dist	Azi	FCC	Margin
990630	APP 220A	Pendergrass	GA	49.50	311.8	222.0	-172.50
WUGA	LIC 219A	Athens	GA	0.00	0.0	161.0	-161.00
AP220	APP-N 220C3	Toombsboro	GA	93.71	175.4	237.0	-143.29
RDEL	DEL 221A	Elberton	GA	32.37	67.9	161.0	-128.63
WWRKFM	LIC 221A	Elberton	GA	32.37	67.9	161.0	-128.63
ALLO	USE 221A	Elberton	GA	32.37	67.9	161.0	-128.63
990514	APP 220A	Milledgeville	GA	93.85	178.3	222.0	-128.15
AP220	APP 220A	Milledgeville	GA	105.05	178.7	222.0	-116.95
WCLK	LIC-D 220A	Atlanta	GA	109.15	260.2	222.0	-112.85
ALLO	VAC 221A	Lavonia	GA	59.56	0.5	161.0	-101.44
WJGAFM	LIC 221A	Jackson	GA	97.78	223.2	161.0	-63.22
ALLO	USE 221A	Jackson	GA	97.78	223.2	161.0	-63.22
ALLO	USE 222A	Bostwick	GA	33.88	236.1	94.0	-60.12
WMOQ	LIC 222A	Bostwick	GA	34.56	236.7	94.0	-59.44
WUOT	LIC 220C	Knoxville	TN	239.82	344.9	290.0	-50.18
970416	APP 219A	Griffin	GA	123.79	232.7	161.0	-37.21
WTBIFM	LIC 219A	Greenville	SC	124.83	35.6	161.0	-36.17
981203	APP-D 220A	La Grange	GA	186.49	238.2	222.0	-35.51
WLPE	LIC 219A	Augusta	GA	125.60	105.5	161.0	-35.40
961104	APP-D 219C3	Peachtree City	GA	141.46	239.5	176.0	-34.54
970416	APP-D 219C3	Peachtree City	GA	141.48	239.5	176.0	-34.52
ALLO	USE 221A	Louisville	GA	128.12	141.6	161.0	-32.88
WPEHFM	LIC 221A	Louisville	GA	128.12	141.6	161.0	-32.88
WLPE.A	APP-N 219A	Augusta	GA	128.52	107.2	161.0	-32.48
WLPE.A	APP 219A	Augusta	GA	128.52	107.2	161.0	-32.48
981203	APP-D 220A	La Grange	GA	192.63	239.8	222.0	-29.37
981202	APP 220A	La Grange	GA	194.63	238.8	222.0	-27.37
980604	APP-D 220A	La Grange	GA	196.75	234.3	222.0	-25.25
RDEL	DEL 221A	Saluda	SC	135.87	83.6	161.0	-25.13
ALLO	USE 221A	Saluda	SC	135.87	83.6	161.0	-25.13
WJESFM	LIC 221A	Saluda	SC	135.87	83.6	161.0	-25.13
WCCV	LIC-D 219C2	Cartersville	GA	167.49	279.7	188.0	-20.51
970416	APP 219A	Peachtree City	GA	141.46	239.5	161.0	-19.54
WJESFM	CP 221A	Saluda	SC	146.73	84.4	161.0	-14.27
WWEVFM	LIC-D 218C2	Cumming	GA	91.37	293.0	105.0	-13.63
WVGS	LIC 220A	Statesboro	GA	214.73	140.3	222.0	-7.27
WAEG	LIC 222A	Evans	GA	100.91	111.1	94.0	6.91
WBTRFM	LIC 221A	Carrollton	GA	168.78	256.9	161.0	7.78
ALLO	USE 221A	Carrollton	GA	168.78	256.9	161.0	7.78
ALLO	USE 222A	Evans	GA	101.80	112.0	94.0	7.80
ALLO	VAC 274C3	Buckhead	GA	43.97	188.0	31.0	12.97
RADD	ADD 221C3	Irmo	SC	189.14	81.7	176.0	13.14

**CERTIFICATE OF SERVICE**

I, Janice M. Rosnick, do hereby certify that I have on this 5<sup>th</sup> day of November caused to be hand delivered a copy of the foregoing **SUPPLEMENT TO PETITION FOR RULEMAKING** to the following:

R. Barthen Gorman, Esquire  
Federal Communications Commission  
Mass Media Bureau  
445 12<sup>th</sup> Street, SW  
Room 3-A224  
Washington, DC 20554

  
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Janice M. Rosnick